

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK**

CHRISTINA LEWIS, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

v.

YRC WORLDWIDE INC., JAMES L.
WELCH, JAMIE G. PIERSON, STEPHANIE
D. FISHER, and DARREN D. HAWKINS,

Defendants.

Case No. 1:19-cv-00001-GTS-ATB

**NOTICE OF MOTION FOR FINAL APPROVAL
OF PROPOSED CLASS ACTION SETTLEMENT**

PLEASE TAKE NOTICE that pursuant to Federal Rule of Civil Procedure 23(e) and this Court's Order Granting Lead Plaintiffs' Motion for Preliminary Approval of Class Action Settlement (ECF No. 98), Lead Plaintiffs Peter Szabo and the City of Warwick Retirement Fund ("Plaintiffs"), by their undersigned counsel, hereby move this Court, before the Honorable Glenn T. Suddaby, United States District Judge of the United States District Court for the Northern District of New York, 100 S. Clinton Street, Syracuse, NY 13261, on August 18, 2021 at 11:00 a.m., for entry of an Order granting final approval of the proposed class action settlement.

This motion is based on this Notice of Motion, Plaintiffs' supporting Memorandum of Law, and the Joint Declaration of Michael J. Wernke and Jeffrey P. Campisi and exhibits attached thereto, all filed contemporaneously herewith, all pleadings, records, and papers on file herein, and such further argument and briefing as may be presented at or before any hearing.

Plaintiffs will file a proposed final order and judgment with their reply, to account fully for any requests for exclusions or objections received by the July 21, 2021 deadline.

Dated: July 14, 2021

Respectfully submitted,

/s/ Michael J. Wernke

Jeremy A. Lieberman

Michael J. Wernke

Veronica V. Montenegro

POMERANTZ LLP

600 Third Avenue, 20th Floor

New York, NY 10016

Telephone: (212) 661-1100

Facsimile: (212) 661-8665

Email: jalieberman@pomlaw.com

mjwernke@pomlaw.com

vvmontenegro@pomlaw.com

Counsel for Peter Szabo and

Co-Lead Counsel for the Proposed Class

/s/ Donald R. Hall

Donald R. Hall

Jeffrey P. Campisi

(Bar Roll Number: 700753)

Jason A. Uris

KAPLAN FOX & KILSHEIMER LLP

850 Third Avenue, 14th Floor

New York, NY 10022

Telephone: (212) 687-1980

Facsimile: (212) 687-7714

Email: dhall@kaplanfox.com

jcampisi@kaplanfox.com

juris@kaplanfox.com

*Counsel for Lead Plaintiff City of Warwick
Retirement Board and Co-Lead Counsel for
the Proposed Class*

Jonathan B. Fellows
George H. Lowe
BOND SCHOENECK & KING, PLLC
One Lincoln Center
Syracuse, NY 13202
Telephone: (315) 218-8000
Facsimile: (315) 218-8100
Email: jfellows@bsk.com
glowe@bsk.com

*Local Counsel for Lead Plaintiffs and the
Proposed Class*

GLANCY PRONGAY & MURRAY LLP
Lesley Portnoy
1925 Century Park East, Suite 2100
Los Angeles, CA 90067
Telephone: 310-201-9150
Facsimile: 310-201-9160
Email: lportnoy@glancylaw.com

THE ROSEN LAW FIRM, P.A.
Phillip Kim, Esq.
275 Madison Avenue, 34th Floor
New York, New York 10016
Telephone: (212) 686-1060
Fax: (212) 202-3827
Email: pkim@rosenlegal.com

**BRONSTEIN, GEWIRTZ
& GROSSMAN, LLC**
Peretz Bronstein
60 East 42nd Street, Suite 4600
New York, NY 10165
(212) 697-6484
Email: peretz@bgandg.com

CERTIFICATE OF SERVICE

I hereby certify that on July 14, 2021, a true and correct copy of the foregoing document was served by CM/ECF to the parties registered to the Court's CM/ECF system.

By: /s/ Michael J. Wernke
Michael J. Wernke